

JUN 12 2012

JUDGE GETTLEMAN

MAGISTRATE JUDGE VALDEZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,

v.

RAGHUVVEER NAYAK

) No.

)

) Violations: Title 18, United States Code,

) Sections 1341, 1346, and 1952; Title 26,

) United States Code, Section 7206(1).

12CR0447

COUNT ONE

The SPECIAL FEBRUARY 2011-1 GRAND JURY charges:

1. At times material to this indictment:

a. Defendant RAGHUVVEER NAYAK ("NAYAK") owned and/or controlled a number of health care-related businesses in Illinois and Indiana, including Rogers Park One Day Surgery Center, Inc., Lakeshore Surgery Center LLC, Lakeside Surgery Center LLC, Merrillville Plaza Surgery Center LLC, Lincoln Park Open MRI, Delaware Place MRI, LLC, Paulina Anesthesia, Inc., Illiana Anesthesia, Western Touhy Anesthesia, Inc., and Division Medical Diagnostics, Inc. (collectively, "NAYAK's Facilities").

b. Rogers Park One Day Surgery Center ("Rogers Park") was an ambulatory surgery center located at 7616 North Paulina Avenue in Chicago, Illinois.

c. Lakeshore Surgery Center ("Lakeshore") was an ambulatory surgery center located at 7200 North Western Avenue in Chicago, Illinois.

d. Physicians referred patients to have surgeries and other medical procedures performed at NAYAK's Facilities, including Rogers Park and Lakeshore.

e. Physicians owed a duty of honest services to their patients for decisions made

relating to the medical care of those patients, including the choice of the facility for surgery and other medical procedures.

f. Certain of NAYAK's Facilities, including Rogers Park and Lakeshore, charged patients a fee for the use of the facility for surgeries and other medical procedures. NAYAK's Facilities did not accept for treatment patients insured by public health insurance programs, such as the Medicare or Medicaid benefits programs. NAYAK's Facilities instead accepted for treatment patients insured by private health insurers, such as Blue Cross Blue Shield ("Blue Cross"), or patients who agreed to pay the entire fee themselves. NAYAK's Facilities did not enter into provider agreements with private health insurers, so that private health insurers treated NAYAK's Facilities as "out-of-network" for purposes of paying bills submitted by NAYAK's Facilities for patient care.

g. NAYAK's Facilities contracted with outside billing services to submit bills to and collect payments from patients and their private health insurers. At times, NAYAK's Facilities used collection agencies to obtain payments from patients who did not pay bills they incurred at NAYAK's Facilities.

The Scheme To Defraud

2. Beginning no later than in or about 2000 and continuing through at least in or about December 2010, in the Northern District of Illinois, Eastern Division, and elsewhere,

RAGHUVeer NAYAK,

defendant herein, together with others, knowingly and with the intent to defraud, devised and participated in a scheme to defraud and to deprive patients of their right to the honest services of their physicians through bribery and kickbacks, which scheme is further described below.

3. It was part of the scheme that NAYAK paid and arranged to pay physicians bribes and kickbacks in the form of cash and other hidden payments so that the physicians would refer their patients to undergo medical treatment at NAYAK's Facilities. Over the course of the scheme, NAYAK paid hundreds of thousands of dollars to different physicians in exchange for the referrals that the physicians had made or would make to NAYAK's Facilities. As NAYAK intended, the physicians materially deceived their patients by not disclosing to the patients that the physicians were being paid to make referrals to NAYAK's Facilities.

Paying Bribes and Kickbacks For Referrals

4. It was further part of the scheme that NAYAK offered and paid kickbacks and bribes to physicians to ensure that the physicians referred patients for treatment at NAYAK's Facilities, including Rogers Park and Lakeshore. At times, NAYAK offered the kickbacks and bribes to convince physicians to begin referring patients to NAYAK's Facilities, and at other times NAYAK offered the kickbacks and bribes to physicians to ensure that they continued to refer patients to NAYAK's Facilities.

5. It was further part of the scheme that NAYAK arranged for employees at his facilities to record the number of patients referred to each facility by different physicians. At times, NAYAK paid or offered to pay a physician a set amount of money for each patient referral made by that physician to NAYAK's Facilities.

6. It was further part of the scheme that NAYAK concealed and attempted to conceal his bribe and kickback payments to physicians, such as by paying the bribes and kickbacks in cash, describing the bribes and kickbacks as payments for advertising, or by otherwise disguising the true purpose of the payments to physicians through fraudulent agreements and contracts.

7. It was further part of the scheme that NAYAK disguised the bribes and kickbacks through the use of fraudulent employment contracts, which purported to pay physicians for performing duties and services for NAYAK's Facilities, when, as NAYAK knew, the physicians did not actually perform the duties described in the fraudulent employment contracts.

Obtaining Cash for the Scheme

8. It was further part of the scheme that NAYAK obtained cash, including for the purpose of paying bribes and kickbacks to physicians, by giving Individual A over \$2 million in checks drawn on NAYAK's Facilities from about 2002 through December 2008. In exchange, at NAYAK's direction, Individual A gave NAYAK cash in an amount equal to about 70% of the value of the checks that NAYAK gave to Individual A.

9. It was further part of the scheme that NAYAK hid the true purpose of the checks that he provided to Individual A by, among other things, indicating to NAYAK's tax preparer that the checks to Individual A were for advertising, and should be treated as advertising expenses on the tax returns that NAYAK signed and caused to be filed for himself and for NAYAK's Facilities. NAYAK subsequently filed and caused to be filed tax returns for himself and for NAYAK's Facilities that falsely indicated that the money that NAYAK gave to Individual A in checks was advertising expenses incurred by NAYAK's Facilities. As NAYAK knew, Individual A did not perform advertising services in exchange for the checks that NAYAK gave to Individual A.

Concealment of the Scheme

10. It was further part of the scheme that NAYAK did misrepresent, conceal, and hide, and cause to be misrepresented, concealed, and hidden, the acts done in furtherance of the scheme and the purposes of those acts.

11. It was further part of the scheme that NAYAK took additional steps to conceal and hide the scheme after he was interviewed by law enforcement agents in December 2008 about matters that related to his relationship with Individual A, such as by executing fraudulent contracts and by warning physicians not to speak with law enforcement about NAYAK's payments.

Mail Fraud: Letter to Patient SO

12. On or about February 13, 2008, at Chicago, in the Northern District of Illinois, Eastern Division,

RAGHUVeer NAYAK,

defendant herein, for the purpose of executing the above-described scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail, to be sent and delivered by the Postal Service, an envelope containing a check from Blue Cross and addressed to Patient SO;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT TWO

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 11 of Count One of this indictment are incorporated here .

Mail Fraud: Letter to Patient MM

2. On or about November 5, 2009, at Chicago, in the Northern District of Illinois, Eastern Division,

RAGHUVVEER NAYAK,

defendant herein, for the purpose of executing the above-described scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail, to be sent and delivered by the Postal Service, an envelope containing a check from Blue Cross and addressed to Patient MM;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT THREE

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 11 of Count One of this indictment are incorporated here.

Mail Fraud: Letter to Patient MS

2. On or about June 20, 2009, at Chicago, in the Northern District of Illinois, Eastern Division,

RAGHUVVEER NAYAK,

defendant herein, for the purpose of executing the above-described scheme, and attempting to do so, knowingly caused to be delivered by mail according to the directions thereon, an envelope containing a check from an insurance company, which envelope was addressed to Patient MS at his address in Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT FOUR

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 11 of Count One of this indictment are incorporated here.

Mail Fraud: Letter Regarding Patient BA

2. On or about November 5, 2008, at Chicago, in the Northern District of Illinois, Eastern Division,

RAGHUVeer NAYAK,

defendant herein, for the purpose of executing the above-described scheme, and attempting to do so, knowingly caused to be delivered by mail according to the directions thereon, an envelope containing a check from an insurance company, which envelope was addressed to Lake Shore at an address in Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT FIVE

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 11 of Count One of this indictment are incorporated here.

Mail Fraud: Letter to Patient AH

2. On or about September 25, 2007, at Chicago, in the Northern District of Illinois, Eastern Division,

RAGHUVVEER NAYAK,

defendant herein, for the purpose of executing the above-described scheme, and attempting to do so, knowingly caused to be delivered by mail according to the directions thereon, an envelope containing a letter from a collection agency, which envelope was addressed to Patient AH at her address in Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT SIX

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 11 of Count One of this indictment are incorporated here.

Mail Fraud: Letter Regarding Patient NF

2. On or about June 2, 2009, at Westchester, in the Northern District of Illinois, Eastern Division,

RAGHUVVEER NAYAK,

defendant herein, for the purpose of executing the above-described scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail, to be sent and delivered by the Postal Service, an envelope containing a check from the Health and Welfare Department of Construction and General Laborer's District Counsel of Chicago and Vicinity and addressed to Rogers Park at a postal box in Carol Stream, Illinois;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT SEVEN

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 11 of Count One of this indictment are incorporated here.

Mail Fraud: Letter to Patient KB

2. On or about July 5, 2007, at Chicago, in the Northern District of Illinois, Eastern Division,

RAGHUVVEER NAYAK,

defendant herein, for the purpose of executing the above-described scheme, and attempting to do so, knowingly caused to be delivered by mail according to the directions thereon, an envelope containing a letter from a collection agency, which envelope was addressed to Patient KB at her address in Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT EIGHT

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 11 of Count One of this indictment are incorporated here.

Mail Fraud: Letter to Patient EC

2. On or about March 26, 2008, at Chicago, in the Northern District of Illinois, Eastern Division,

RAGHUVVEER NAYAK,

defendant herein, for the purpose of executing the above-described scheme, and attempting to do so, knowingly caused to be delivered by mail according to the directions thereon, an envelope containing a check from an insurance company, which envelope was addressed to Patient EC at his address in Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT NINE

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 11 of Count One of this indictment are incorporated here.

Mail Fraud: Letter to Patient DR

2. On or about July 16, 2007, at Chicago, in the Northern District of Illinois, Eastern Division,

RAGHUVVEER NAYAK,

defendant herein, for the purpose of executing the above-described scheme, and attempting to do so, knowingly caused to be delivered by mail according to the directions thereon, an envelope containing a letter from a collection agency, which envelope was addressed to Patient DR at her address in Chicago, Illinois;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT TEN

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraphs 1 through 11 of Count One of this indictment are incorporated here.

Mail Fraud: Letter to Patient CL

2. On or about November 13, 2007, at Chicago, in the Northern District of Illinois, Eastern Division,

RAGHUVVEER NAYAK,

defendant herein, for the purpose of executing the above-described scheme, and attempting to do so, knowingly caused to be placed in an authorized depository for mail, to be sent and delivered by the Postal Service, an envelope containing a check from Blue Cross and addressed to Patient CL;

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT ELEVEN

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are incorporated here.
2. On or about December 5, 2007, in the Northern District of Illinois, Eastern Division,
and elsewhere,

RAGHUVeer NAYAK,

defendant herein, caused travel in interstate commerce, namely the travel of Patient SO from Wisconsin to Illinois, with the intent to promote and carry on, and to facilitate the promotion, and carrying on, of an unlawful activity, namely, bribery in violation of the laws of Illinois, and thereafter, did perform and attempt to perform an act of promotion, carrying on, and facilitation of the promotion and carrying on, of the unlawful activity;

In violation of Title 18, United States Code, Section 1952.

COUNT TWELVE

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are incorporated here.
2. On or about December 5, 2007, in the Northern District of Illinois, Eastern Division,

and elsewhere,

RAGHUVVEER NAYAK,

defendant herein, caused travel in interstate commerce, namely the travel of Patient BA from Indiana to Illinois, with the intent to promote and carry on, and to facilitate the promotion, and carrying on, of an unlawful activity, namely, bribery in violation of the laws of Illinois, and thereafter, did perform and attempt to perform an act of promotion, carrying on, and facilitation of the promotion and carrying on, of the unlawful activity;

In violation of Title 18, United States Code, Section 1952.

COUNT THIRTEEN

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are incorporated here.
2. On or about April 6, 2009, in the Northern District of Illinois, Eastern Division, and elsewhere,

RAGHUVVEER NAYAK,

defendant herein, caused travel in interstate commerce, namely the travel of Patient NF from Indiana to Illinois, with the intent to promote and carry on, and to facilitate the promotion, and carrying on, of an unlawful activity, namely, bribery in violation of the laws of Illinois, and thereafter, did perform and attempt to perform an act of promotion, carrying on, and facilitation of the promotion and carrying on, of the unlawful activity;

In violation of Title 18, United States Code, Section 1952.

COUNT FOURTEEN

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are incorporated here.
2. On or about July 5, 2007, in the Northern District of Illinois, Eastern Division, and

elsewhere,

RAGHUVVEER NAYAK,

defendant herein, caused to be used the mail in interstate commerce, namely, a letter sent from Fort Wayne, Indiana by a collection agency and delivered to Patient KB in Chicago, Illinois, with the intent to promote and carry on, and to facilitate the promotion, and carrying on, of an unlawful activity, namely, bribery in violation of the laws of Illinois, and thereafter, did perform and attempt to perform an act of promotion, carrying on, and facilitation of the promotion and carrying on, of the unlawful activity;

In violation of Title 18, United States Code, Section 1952.

COUNT FIFTEEN

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are incorporated here.
2. On or about July 16, 2007, in the Northern District of Illinois, Eastern Division, and elsewhere,

RAGHUVeer NAYAK,

defendant herein, caused to be used the mail in interstate commerce, namely, a letter sent from Fort Wayne, Indiana by a collection agency and delivered to Patient DR in Chicago, Illinois, with the intent to promote and carry on, and to facilitate the promotion, and carrying on, of an unlawful activity, namely, bribery in violation of the laws of Illinois, and thereafter, did perform and attempt to perform an act of promotion, carrying on, and facilitation of the promotion and carrying on, of the unlawful activity;

In violation of Title 18, United States Code, Section 1952.

COUNT SIXTEEN

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are incorporated here.
2. From about 2002 to about December 2008, NAYAK caused NAYAK's Facilities to withdraw funds from corporate bank accounts and, thereafter, fraudulently record those withdrawals as payments for advertising.
3. From about 2002 to about December 2008, NAYAK obtained cash for, among other things, the purpose of paying physicians kickbacks and bribes by giving Individual A over \$2 million in checks drawn on NAYAK's Facilities. In exchange, at NAYAK's direction, Individual A gave NAYAK cash in an amount equal to about 70% of the value of the checks that NAYAK gave to Individual A.
4. NAYAK hid the true purpose of the checks that he provided to Individual A from the Internal Revenue Service by, among other things, indicating to NAYAK's tax preparer that the checks to Individual A were for advertising, and should be treated as advertising expenses on the individual and corporate tax returns that NAYAK's tax preparer created for NAYAK and NAYAK's Facilities. As NAYAK knew, Individual A did not perform advertising services in exchange for the checks that NAYAK gave to Individual A.
5. As a result, NAYAK caused the preparation of false and fraudulent individual income tax returns understating NAYAK's true gross income, and income taxes due and owing, as well as false and fraudulent corporate tax returns for NAYAK's Facilities, and, thereafter, NAYAK signed and submitted the false and fraudulent tax returns to the Internal Revenue Service.
6. On or about December 26, 2007, in the Northern District of Illinois, Eastern Division,

RAGHUVVEER NAYAK,

defendant herein, willfully made, subscribed, and caused to be made and subscribed a joint U.S. Individual Income Tax Return, Form 1040 (with attachments), for the calender year 2005, which was verified by written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which income tax return he did not believe to be true and correct as to every material matter, in that such tax return falsely stated on Line 1C that NAYAK and his wife's total adjusted gross income was \$4,643,916, when NAYAK knew and believed that their total adjusted gross income substantially exceeded \$4,643,916;

In violation of Title 26, United States Code, Section 7206(1).

COUNT SEVENTEEN

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One and paragraphs 2 through 5 of Count Sixteen of this indictment are incorporated here

2. On or about January 24, 2008, in the Northern District of Illinois, Eastern Division,

RAGHUVeer NAYAK,

defendant herein, willfully made, subscribed, and caused to be made and subscribed a joint U.S. Individual Income Tax Return, Form 1040 (with attachments), for the calendar year 2006, which was verified by written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which income tax return he did not believe to be true and correct as to every material matter, in that such tax return falsely stated on Line 1C that NAYAK and his wife's total adjusted gross income was \$6,471,865, when NAYAK knew and believed that their total adjusted gross income substantially exceeded \$6,471,865;

In violation of Title 26, United States Code, Section 7206(1).

COUNT EIGHTEEN

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One and paragraphs 2 through 5 of Count Sixteen of this indictment are incorporated here
2. On or about September 14, 2008, in the Northern District of Illinois, Eastern Division,

RAGHUVeer NAYAK,

defendant herein, willfully made, subscribed, and caused to be made and subscribed a joint U.S. Individual Income Tax Return, Form 1040 (with attachments), for the calendar year 2007, which was verified by written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which income tax return he did not believe to be true and correct as to every material matter, in that such tax return falsely stated on Line 37 that NAYAK and his wife's total adjusted gross income was \$5,791,109, when NAYAK knew and believed that their total adjusted gross income substantially exceeded \$5,791,109;

In violation of Title 26, United States Code, Section 7206(1).

COUNT NINETEEN

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One and paragraphs 2 through 5 of Count Sixteen of this indictment are incorporated here.
2. On or about September 18, 2009, in the Northern District of Illinois, Eastern Division,

RAGHUVVEER NAYAK,

defendant herein, willfully made, subscribed, and caused to be made and subscribed a joint U.S. Individual Income Tax Return, Form 1040 (with attachments), for the calendar year 2008, which was verified by written declaration that it was made under the penalties of perjury and was filed with the Internal Revenue Service, which income tax return he did not believe to be true and correct as to every material matter, in that such tax return falsely stated on Line 37 that NAYAK and his wife's total adjusted gross income was \$9,362,647, when NAYAK knew and believed that their total adjusted gross income substantially exceeded \$9,362,647;

In violation of Title 26, United States Code, Section 7206(1).

FORFEITURE ALLEGATION

The SPECIAL FEBRUARY 2011-1 GRAND JURY further charges:

1. The allegations contained in Counts One through Fifteen of this Indictment are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(c) and Title 28, United States Code, Section 2461(c).

2. As a result of his violations of Title 18, United States Code, Sections 1341 and 1952, as alleged in the foregoing Indictment,

RAGHUVeer NAYAK,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section, 981(a)(1)(c) and Title 28, United States Code, Section 2461(c), any and all right, title and interest in property, real and personal, which constitutes and is derived from proceeds traceable to the charged offenses.

3. The interests of the defendant subject to forfeiture pursuant to Title 18, United States Code, Section, 981(a)(1)(c) and Title 28, United States Code, Section 2461(c) include but are not limited to, at least \$1.8 million.

4. If any of the funds subject to forfeiture and described above, as a result of any act or omission of the defendant:

- (a) Cannot be located upon the exercise of due diligence;
- (b) Have been transferred or sold to, or deposited with, a third party;
- (c) Have been placed beyond the jurisdiction of the Court;
- (d) Have been substantially diminished in value; or

- (e) Have been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property, including but not limited to, the following property, under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c):

- (i) The real property commonly known as: 124 Covington Court, Oakbrook, Illinois, legally described as follows:

Parcel 1: Lot 23 in Covington, Being a Resubdivision of Lots 20, 21, 22 and 23 in Whitehall Park, a Subdivision of Part of Section 34, Lying North and South of the Indian Boundary Line, in Township 39 North, Range 11, East of the Third Principal Meridian, According to the Plat Thereof Recorded November 24, 1993 as Document Number R93-272818, in Dupage County, Illinois.

Parcel 2: Easement for Ingress and Egress, Appurtenant to and for the Benefit of Parcel 1, over Private Roads, as Shown on the Plat of Whitehall Park, Recorded as Document Number R84-40190 and as Set Forth in the Declaration Recorded as Document Number R84-40192, in Dupage County, Illinois.

PIN: 06-34-201-080

- (ii) The real property commonly known as: 7616 North Paulina Avenue, Chicago, Illinois, legally described as follows:

Lots 55 and 56 in Birchwood Addition to Evanston a Subdivision of the South 6.25 Chains of the Northwest 1/4 of Section 30, Township 41 North, Range 14 East of the Third Principal Meridian Lying East of the Right of Way of the Chicago Milwaukee and St. Paul Railroad (Except from Said Lots 55 and 56 All That Part Thereof Lying Southwesterly of the Northwesterly Line of Part of Said Lots 55 and 56 Dedicated for a Public Alley by Plat Recorded July 7, 1921 in Book 161 of Plats Page 46 and Known as Document 7197660) all in Cook County, Illinois.

PIN: 11-30-213-037-0000; and

- (iii) The real property commonly known as: 7200 North Western Avenue, Chicago, Illinois, legally described as follows:

Lot 1 (Except the North 92 Feet Thereof and Except That Part Lying East of a Line 50 Feet West of and Parallel with the East Line of Section 25) and the East 80 Feet of the South 175 Feet of Lot 2 in Muno's Subdivision of the East 1/3 (Except the West 200 Feet of the South 435.6 Feet Thereof) of the South East 1/4 of the South East 1/4 of Section 25, Township 41 North, Range 13, East of the Third Principal Meridian, in Cook County, Illinois.

PIN: 10-25-428-110-0000

All pursuant to Title 18, United States Code, Section 981(a)(1)(c) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY